

**From:** [Keith, Glenn \(DEP\)](#)  
**To:** [Bird, Patrick](#); [Wolman, Marc \(DEP\)](#)  
**Subject:** RE: Pyrolysis and MWCs  
**Date:** Wednesday, September 19, 2018 12:31:50 PM

---

Since the gas that is combusted is only from anaerobic digestion it seems to me this would not be an MWC (no combustion of waste or combustion of waste pyrolysis gas). Thoughts?

---

**From:** Keith, Glenn (DEP)  
**Sent:** Wednesday, September 19, 2018 11:55 AM  
**To:** 'Bird, Patrick'; Wolman, Marc (DEP)  
**Subject:** RE: Pyrolysis and MWCs

FYI – here's a link that includes the latest possible technology proposal (developed by Orsted – formerly Dong Energy) for which a plant in the UK is currently operating (see video at the bottom of the page that provides a tour of the facility).

<https://orsted.com/en/Our-business/Bioenergy-and-Thermal-Power/Renescence>

---

**From:** Bird, Patrick [mailto:Bird.Patrick@epa.gov]  
**Sent:** Friday, July 20, 2018 9:25 AM  
**To:** Keith, Glenn (DEP); Wolman, Marc (DEP)  
**Subject:** Pyrolysis and MWCs

Hi Glenn and Marc,

I wanted to follow up with you on our conversation about MWC rule applicability when using a pyrolysis system. I spoke with the MWC rule writer, and pyrolysis units combusting MSW would be subject to MWC regulations based on the very clear regulatory language in the applicability section of our rules. However, since the Synova system uses a combustion turbine, that usually requires significant gas processing so the combustion device does not foul. Synova's promotional video confirms that they have some level of gas processing. Marc's you may have been alluding this this on our call when you were differentiating between combustion turbines v boilers.

Because of the level of processing, the rule writer said she's seen a few companies explore the possibility of getting a non-waste determination for specific non-hazardous secondary materials when used as a fuel under our solid waste regulations (40 CFR Part 241). She was not aware of any sources that have followed through with this, but since there is a considerable amount of processing of the gas required, that avenue may be open for these types of configurations.

Just wanted to pass this along. Let me know if you'd like to discuss further.

Pat

Patrick Bird

U.S. EPA - Region 1

5 Post Office Square, OEP05-2

Boston, MA 02109-3912

Phone: 617-918-1287

Fax: 617-918-0287

Email: [bird.patrick@epa.gov](mailto:bird.patrick@epa.gov)